Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☑ Record 1 of 1

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Dear FCC,

Thank you for requesting comments regarding this proposal.

My background:
I hold an Extra class amateur radio license and am an Electrical Engineer.
I am also the coordinator/leader of a VE testing team (ARRL).
I was originally licensed in 1964.
I operate almost exclusively on CW.

I will respond to a number of questions that you requested comments on.
To make it easy to see what question my comment is referencing, I will list
the question and then my response.

1)Question:
     Were we to reduce the Morse code elements, should we add elements to
the
     written examination to ensure a working knowledge of the new digital
     technologies which, in part, are replacing the Morse code?
  My comment:
     Yes, most definitely. This is a very important frontier for amateur
     radio. An introductory study of digital technologies should be
required
     of all applicants.

2)Question:
     Should we consider specifying the method of examining for Morse code
     proficiency, such as requiring fill-in-the-blank or copying one out of
     five minutes sent, instead of allowing VE's to determine how to test
for
     code speed?
  My Comment:
     YES, PLEASE! It puts the VEs in a very awkward position to have to
make
     this decision. A fill-in-the-blank test would be more difficult, and a
     solid copy test would be even more difficult, but it nees to be
specified.
     My choice would be to always allow the minute of solid copy to pass,
but
     a fill-in-the-blank test could be administered if the applicant did not
     have a minute of solid copy. The multiple choice exams are much too
     easy. For example, I think a multiple choice exam for 20 wpm is easier
     than a fill-in-the-blank for 13 wpm. Let's make them consistant!
     Just as the VEs can't give decide an whether they want to give "easy"
or
     "hard" written examinations, we shouldn't have to make the decision
     regarding the difficulty of Morse tests to administer either.

     Along this same line, some other rules need to be clearly spelled out:
     a) Can an applicant write down "dot dash" on his paper and come back
later
     to decipher it to be an "A"? This is not currently specified. Some VE
     teams allow it, and others don't. Some don't mention this before the
test
     is administered, and can have major confrontation if they decide to
enforce
     a their understanding of this rule. My preference is NOT to allow the

written "dot dash", but I would like it specified one way or the other.
b) How much time is the applicant allowed to go back through his text
to
make corrections? One minute? Unlimited? My preference is unlimited.

3)Question:
Should VE's be authorized to request medical informatino from the
certifying physician pertaining to the examinee's disability?
My Comment:
I have never had an applicant present a medical waiver application.
From
what I have heard from other testing teams, I do think the medical
waiver
is often acquired from sympathetic and possibly over-worked physicians.
I
think the form should require more than just a physician's signature,
and
the form should state that the physician's license is in jeopardy for
fraud if he knowingly submits a false affadavit.

4)Q: Should written examinations be modified to provide VEs and VECs
additional
flexibility in determining the specific contents of written
examinations?
A: I think it is appropriate for the FCC to specify the number of
questions
in various topics.

However, I would like to see the written examinations changed so that
answers
cannot be memorized. It is a much too easy for memorize answers to
categories
of questions. This could be done by either of these methods:
a) Enlarge the question pool by at least a factor of 10, or
b) Allow problems to be generated by the VE team computer with
variables and
answers selected from a very large pool.
Either of these will still allow immediate, accurate and objective
grading,
but would guarantee the applicant has a basic understanding of the
material
instead of just the ability to memorize.

I am disgusted by the books on the market which show applicants how to
guess
at the answers to the multiple choice problems instead of showing them
how to
do the calculations. It may mean the applicant has to do some reading
or to
take a class. That's good! I think the examination should be an
"starting
point" rather than a "graduation". It should be be a hurdle! Not to
keep
people out but to be demonstrate a true level of understanding. Yes,
this may
eliminate some 5 year old Extra Class licensees. Good.

5)Question:
    Should General Class operators who are VEs prepare and administer
examinations
    for a Technician Class operator license?
  My Comment:
    No. I think all VEs should have an Advanced or Extra class license.

6)Question:
    Should Advanced Class operators who are VEs prepare and administer
examinations
    for a General Class operator license?
  My comment:
    Yes.

7)Question:
    What Morse code requirements should be required for the various
licenses?
  My comment:
    Five words per minute
    Twelve words per minute for Advanced and Extra.
    I do not think a higher speed CW test is required. If people want to
work
    CW, they will. (This is from an person who operates almost exclusively
on
    CW, and at 35 words per minute! I realize this is not for everyone,
even
    though it is easy for me.) If an amateur wants to experiment with
another
    aspect of amateur radio, that's fine with me.

8) Additional comments:
   a) I do not want to see the amateur radio service become another
Citizen's
    band. Amateur radio is unique in that the licensees are allowed to
build
    equipment and experiment.
   b) I don't think it is necessary to increase the numbers of people
ENTERING
    the amateur radio service. I think it is more important to KEEP them.
    We need to keep the unique characteristics if we are going to attract
and
    keep people.